

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:)	Case Number: 07-02546-DD
)	
BROAD CREEK EDGEWATER, LP,)	Chapter 7
)	
DEBTOR)	
_____)	

RESPONSE TO MOTION TO CONVERT


NOW COMES Field & Golan, LLP, Golan & Christie, LLP, and Byrne Acquisition Group, LLC, joined by Thomas & Hutton Engineering Co., ("Petitioning Creditors"), in response to the Motion to Convert filed by the Debtor on June 21, 2007, and shows the Court as follows:

1. The Petitioning Creditors filed this Involuntary Proceeding on May 8, 2007, under Chapter 7 of the United States Bankruptcy Code.
2. That no responsive pleading was filed to the Petition and the Court entered the Order for Relief on June 7, 2006.
3. The Debtor has hired qualified counsel, a qualified real estate consultant with specific knowledge of the property and obtained unsecured post-petition financing that will allow the Debtor to orderly market and sell the property realizing the highest value of the assets.
4. The Petitioning Creditors will seek to participate in the formation of a Committee of Unsecured Creditors organized and appointed under 11 U.S.C. §1102 and seek to have an active role in the case after conversion as provided in the Bankruptcy Code.

5. The Petitioning Creditors are informed and believe that it is likely that there will be sufficient proceeds from the sale of the property to make a substantial distribution to unsecured creditors and to cover the expenses of administration in Chapter 11.

6. The Petitioning Creditors therefore believe that it is in their interest and in the best interest of the estate to allow the conversion of the case to a Chapter 11 proceeding.

WHEREFORE the Petitioning Creditors request that the Court allow the Motion filed by the Debtor to convert the case and request such other and further relief as the Court deems just and proper.



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June 27, 2007


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CERTIFICATE OF SERVICE

I, Glenda F. Parker, of CLAWSON & STAUBES, LLC, Attorneys at Law, hereby certify that: I am, and at all times hereinafter-mentioned am, more than eighteen (18) years of age; That on the 27th day of June, 2007, I served copies of the foregoing Response to Motion to Convert upon all parties on the attached mailing list by mailing a copy thereof, postage prepaid;

Mailing list is attached.



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